REMARKS

The Applicants respectfully request reconsideration of the application in view of the foregoing amendments and the following remarks.

The Applicants have amended independent claims 1, 6, 11, and 32, and have added dependent claims 42 and 43. Support for these amendments is located at pages 1, 2, 3, and 5 of the application, for example, at ¶¶ [0006]-[0008], ¶ [0026], ¶ [0028] and ¶¶ [0031]-[0038].

In the Office action mailed March 29, 2006 ("Office action"), the Examiner rejected claims 1-6, 8-15 and 32 as being unpatentable over U.S. Patent Application Publication 2002/0122067 to Geigel et al. ("Geigel") in view of U.S. Patent Application Publication 2004/0250083 to Schwab ("Schwab"). The Applicants respectfully disagree with the rejections, but have amended claims 1, 6, 11, and 32 to expedite prosecution.

I.   Geigel and Schwab

In the interest of reaching a shared understanding of the disclosures of Geigel and Schwab, the Applicants make the following observations.

Geigel describes a system and method for automatic layout of images in digital albums. (Geigel, Abstract.) A user inputs a collection of images, such as from a digital camera. (*See* Geigel, ¶¶ [0056], [0057], Figure 1.)

An Albuming Automation System ("AAS") analyzes the images and lays out images within an album page or pages. (*Id.*) The AAS incorporates various principles of layout design in its decision-making processes. (Geigel, ¶¶ [0079] – [0084].)

As output, the AAS produces album pages. (Geigel, ¶¶ [0056], [0057], Figure 1.) According to Geigel, AAS output can be printed, displayed, or transferred to media such as a picture compact disc ("CD"). (*Id.*)

Schwab describes a system and method for secure interactive communication of text and image information between a central computer and one or more client computers located at remote sites. (Schwab, Abstract.) Remote client computers access the central database via a network connection. (Schwab, ¶ [0042].)

According to Schwab, item images and item text may be uploaded to the central computer via the remote computers. (Schwab, ¶ [0010].) Characteristics of items are used to search and sort the

various items stored in a relational database. (Schwab, ¶ [0039]). Client computers search based upon

item characteristics, and the searched images are displayed locally. (Schwab, ¶¶ [0082], [0076].)

III. Claims 1, 6, 11, and 32.

Claim 1, as amended, recites:

h)   processing the image file copies to tailor the selected images according to memory size
constraints of the removable storage medium and according to one or more display
characteristics of the television;

...

wherein the album of images is transferable via the removable storage medium
to the set-top box for display on the television.

Claim 6, as amended, recites:

j)   save, to the removable digital storage medium, the one or more compressed
image file copies that correspond to the selected images, wherein the album of
images is saved on the removable storage medium in a format readable by the
stand-alone set-top box for display on the television;

Claim 11, as amended, recites:

e)   means for prompting the user to save the selected images as the digital photo album of
images, wherein the digital photo album is for viewing on the television coupled to the
set-top box;

...

wherein the digital photo album is saved on the removable storage medium in a
format for transferring to the set-top box for display on the television;

Claim 32, as amended, recites:

j)   save, to the removable storage medium, the one or more compressed image file
copies that correspond to the selected images, wherein the album of images
saved to the removable storage medium is readable by the set-top box for
display on the television;

Geigel and Schwab, taken separately or in combination, fail to teach or suggest the above-cited

language.

The present application and technology described therein have certain unexpected benefits:

Many of these households would be able to *enjoy digital photos on
their TV sets if there were a simple, inexpensive way to make this
possible.*   (¶ [0006].)

...

(1) *PC-based software that allows easy creation of a digital photo album tailored for TV viewing*; (2) a small set-top box 10 which displays the digital photo album on a standard TV or other monitor; and (3) optionally and preferably, a remote control 12 used to operate the set-top box, preferably from up to fifty feet away or more.   (¶ [0028], redacted.)

...

After creating a stored photo album, in a preferred embodiment a small TV set-top box is used to display the images on a TV.
                                                                     (¶ [0035].)

...

A set-top box which displays the digital photo album on a standard TV or other monitor: The set-top box embodiment of the present invention preferably has many or all of the following attributes. It is completely stand-alone, *requiring no connection to a computer*.   (¶ [0036].)

...

First, the invention addresses the complete process of selecting and arranging digital images into an album, preprocessing the images for efficient storage onto a removable medium, transferring the album images to a removable medium, and viewing the images. Second, the image processing and video processing architecture of the invention are implemented in the form of a highly optimized integrated circuit design, which is far *less expensive to produce than the PC-processor* based designs on which the prior art was based.   (¶ [0055].)

...

Thus, the technology described in the present application provides inexpensive and unexpected benefits of enjoying digital photos on TV sets, as well as, an inexpensive way to use PC-based software that allows easy creation and transfer of a digital photo album tailored for set-top box TV viewing.

The Geigel and Schwab combination proposed by the Examiner leads away from an "album of images is transferable via the removable storage medium to the set-top box for display on the television" as recited in claim 1. Geigel describes displaying album pages as output. (Geigel, ¶¶ [0056], [0057], Figure 1.) Schwab describes clients with network connections that receive and display searched images. (Schwab, ¶¶ [0082], [0076], [0042].) And, Schwab requires a network connection, which can be quite expensive. As such, the Examiner's proposed combination is different than and

leads away from an "album of images is transferable via the removable storage medium to the set-top box for display on the television." The Examiner's proposed Geigel-Schwab combination also fails to teach or suggest at least one limitation in amended claims 6 ("the album of images is saved on the removable storage medium in a format readable by the stand-alone set-top box for display on the television"), 11 ("album is saved on the removable storage medium in a format for transferring to the set-top box for display on the television"), and 32 ("album of images saved to the removable storage medium is readable by the set-top box for display on the television"), respectively.

Further, the Examiner's proposed combination leads away from tailoring "the selected images according to memory size constraints of the removable storage medium and according to one or more display characteristics of the television," as recited in claim 1. Geigel indicates the *same AAS output* is used whether the AAS output is printed, displayed, or transferred to other media, which leads away from tailoring "the selected images according to memory size constraints of the removable storage medium and according to one or more display characteristics of the television." Additionally, Schwab provides images to requesting clients via the network without regard to the size of any removable storage medium. (Schwab, ¶¶ [0082], [0076], [0042].) Thus, the Examiner's proposed combination leads away from tailoring "the selected images according to memory size constraints of the removable storage medium and according to one or more display characteristics of the television." For this additional reason, claim 1 is allowable.

In view of the foregoing discussion, the Applicants will not belabor the merits of the separate patentability of dependent claims 2-5, 8-10, 12-15, and 33-43.

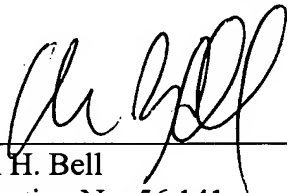Claims 1-6, 8-15, and 32-43 should be allowable.

CONCLUSION

Claims 1-6, 8-15 and 32-43 should be allowable. Such action is respectfully requested. The Examiner is invited to call the undersigned attorney at the telephone number below if the Examiner believes that doing so would further the prosecution of the present application.

Respectfully submitted,

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